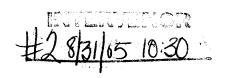
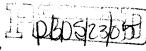
ELLIS: LAWHORNE

John J. Pringle, Jr.
Direct dial: 803/343-1270
jpringle@ellislawhorne.com





May 18, 2005



Dr. maildate 5/105

VIA ELECTRONIC MAIL AND FIRST-CLASS MAIL SERVICE

The Honorable Charles L.A Terreni Chief Clerk South Carolina Public Service Commission Post Office Drawer 11649 Columbia, South Carolina 29211

RE: Generic Proceeding Established to Investigate Emergency

Services Continuity

Docket No. 2005-100-C, Our File No. 611-10116

Dear Mr. Terreni:

Enclosed is the original and ten (10) copies of the **Petition to Intervene** filed by AT&T Communications of the Southern States, LLC in the above-referenced docket.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it in the enclosed envelope. By copy of this letter, I am serving all parties of record and enclose my certificate of service to that effect.

If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,

John J. Pringle, Jr.

JJP/cr

cc:

Office of Regulatory Staff

all parties of record

Enclosures

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA



DOCKET NO. 2005-100-C

IN RE: Generic Proceeding Established) to Investigate Emergency Services) CE Continuity Plans)	RTIFICATE OF SERVICE
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This is to certify that I have caused to be served this day, one (1) copy of the **Petition to Intervene** by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows and by electronic mail service:

Patrick Turner, Esquire
BellSouth Telecommunications, Inc.
PO Box 752
Columbia SC 29202

Stephen W. Hamm, Esquire Richardson, Plowden, Carpenter & Robinson PO Box 7788 Columbia SC 29202

> Scott Elliott, Esquire Elliott & Elliott, PA 721 Olive Street Columbia SC 29205

Office of Regulatory Staff
Legal Department
PO Box 11263
Columbia SC 29211

CatolRoof

May 18, 2005 Columbia, South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA		S. C. PUBLIC SERVICE COMMISSION
DOCI	XET NO. 2005-100-C	MAY 2 0 2005
IN RE: Generic Proceeding Established to Investigate Emergency Services Continuity Plans))) PETITION TO INTERVE)))	NE

AT&T Communications of the Southern States, LLC ("AT&T" or "Petitioner"), by its undersigned attorney, hereby Petitions the South Carolina Public Service Commission (the "Commission"), pursuant to Rule 103-836 of the Commission's Rules, for permission allowing AT&T to intervene in the above-captioned Docket, with full rights to participate as a party of record. In support it its Petition, AT&T would show the Commission the following:

- 1. AT&T is a limited liability company ("LLC") organized under the laws of the State of Delaware. AT&T holds various certificates of public convenience and necessity from this Commission.
 - 2. The full name and address of the authorized representative of AT&T is:

John J. Pringle, Jr., Esquire **Ellis, Lawhorne & Sims, P.A.** P.O. Box 2285 Columbia SC 29202 jpringle@ellislawhorne.com

- 3. On or about April 3, 2003, the Commission issued Order No. 2003-218 in Docket No. 2003-89-C, wherein the Commission held that a generic proceeding should be established to investigate emergency services continuity plans in general and their various ramifications.
- 4. On or about April 19, 2005, the Commission issued a Notice of Generic Proceeding, in Docket No. 2005-100-C to investigate the general concept of an emergency services continuity plan.
- 5. As a telecommunications carrier providing services in South Carolina, AT&T has a vital interest in this proceeding and could be affected by the Commission's rulings in this proceeding. AT&T has not developed a position regarding this proceeding. Accordingly, AT&T seeks status as a party of record in order to learn more about the various issues that are the subject of this Docket.

6. AT&T asserts that the granting of its Petition to Intervene will not in any way delay the proceedings in this Docket.

WHEREFORE, AT&T prays for the Commission to

- a) Grant this Petition to Intervene and make Petitioner a party of record in Docket Number 2005-100-C, allowing Petitioner to participate fully and take such positions as it deems advisable; and
- b) Grant such other relief as the Commission deems just and proper.

Respectfully submitted,

ELLIS, LAWHORNE & SIMS, P.A.

John J. Pringle, Jr., Esquire 1501 Main Street, Fifth Floor

P.O. Box 2285

Columbia, South Carolina 29202

Telephone: 803/343-1270 Facsimile: 803/799-8479 Attorney for AT&T

May 18, 2005 Columbia, South Carolina